

No. 2958.

IN THE ²

CIRCUIT COURT OF APPEALS
OF THE
UNITED STATES

Ninth Circuit.

UNITED STATES OF AMERICA,
Plaintiff and Respondent,
VS.

SOUTHERN PACIFIC COMPANY,
et al.,
Defendants and Appellants.

IN EQUITY.

MAPS ACCOMPANYING
APPELLANTS' BRIEF UPON THE FACTS.

GUY V. SHOUP,
CHARLES R. LEWERS,
JOSEPH H. CALL,
Solicitors for Appellants.

WM. F. HERRIN,
Of Counsel for Appellants.

Filed

APR 24 1907

F. D. Monckton,

Clerk

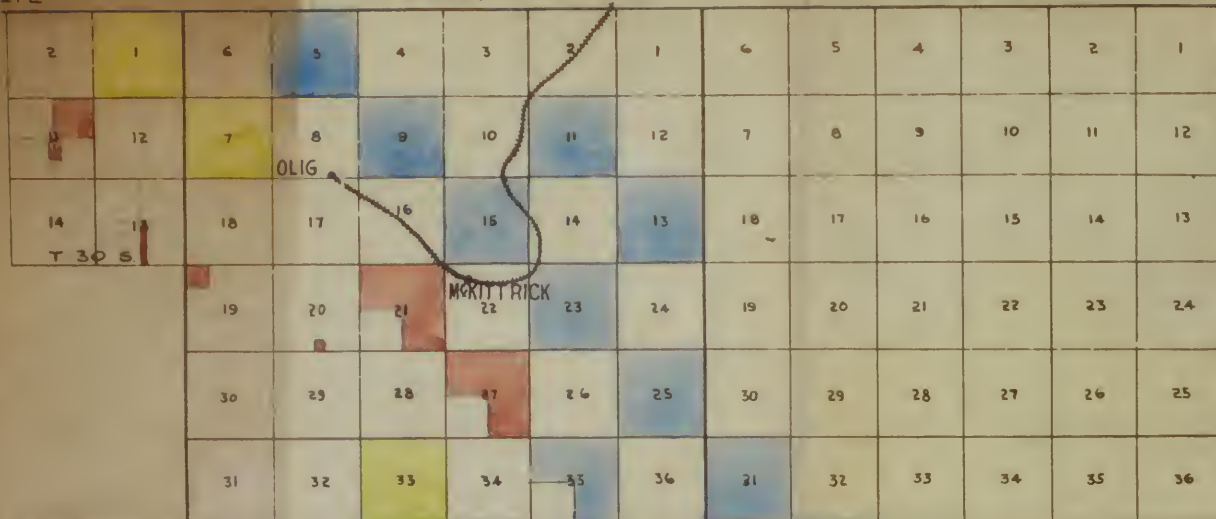


R 21E

R 22E.

R 23E.

R 24E

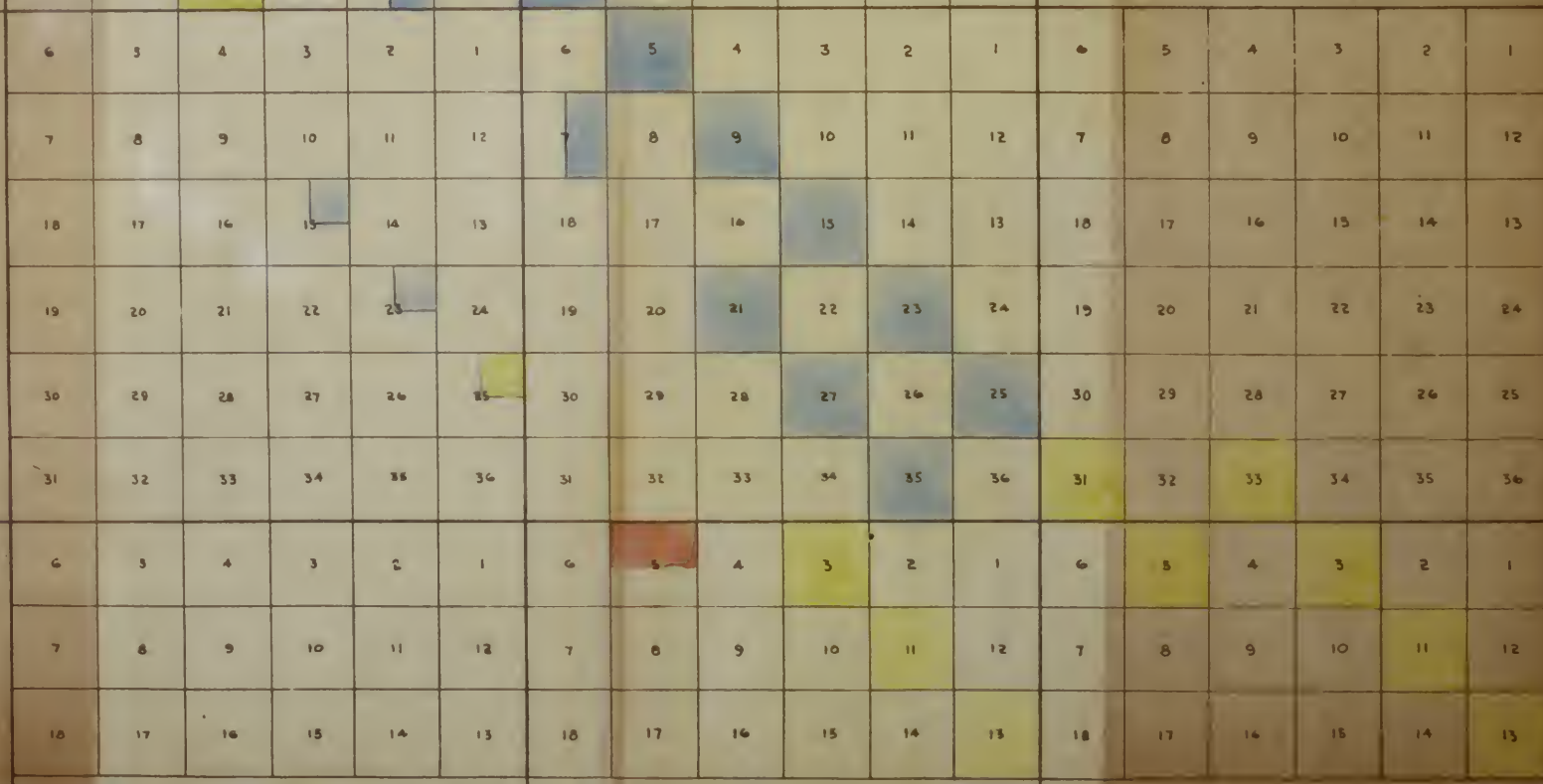


S. P. Oil Land
 McKittrick & Midway Districts
 Oil Land
 Probable Oil Land
 Possible Oil Land

Defendants Exhibit No 120

Copy of plat accompanying letter of Sept 21
 1903 from E.T. Dumble to J Kruttschnitt
 (Tr page 2915)

T 31 S.

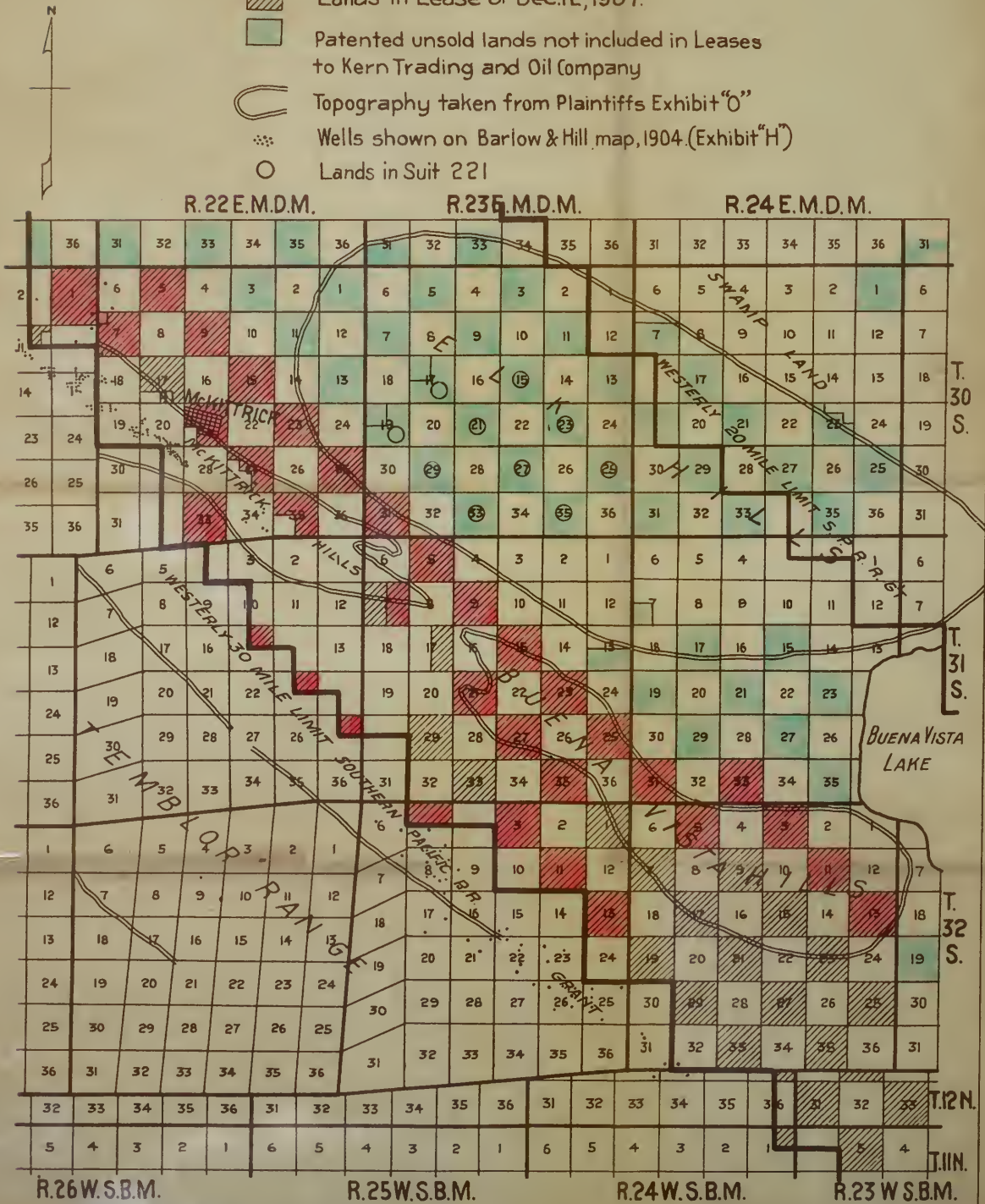


T 32 S.

Plat showing lands in the vicinity of McKittrick included in Lease of S.P.R.R.Co. to K.T. & O. Co. Aug. 2, 1904 and lands included in Renewal Lease of Dec. 12, 1907.

LEGEND

- Lands in Lease of Aug. 2, 1904
- Lands in Lease of Dec. 12, 1907.
- Patented unsold lands not included in Leases to Kern Trading and Oil Company
- Topography taken from Plaintiffs Exhibit "O"
- Wells shown on Barlow & Hill map, 1904. (Exhibit "H")
- Lands in Suit 221

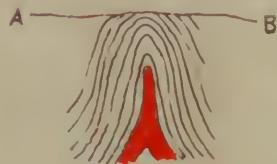


EXPLANATION:- The reduced plat of Plaintiff's Exhibit "O" in a separate envelope accompanying this brief contains territory in the McKittrick and Midway Oil Fields, not shown on the above mentioned plat which accompanied appellant's condensed statement, not reprinted; so that the above calculation of the number of "drilled wells," "producing wells" and "dry holes" having been based on said smaller map is incorrect as to such wells upon exhibit "O" accompanying this brief.

The calculated number of wells and areas upon exhibit "O" accompanying this brief is as follows:

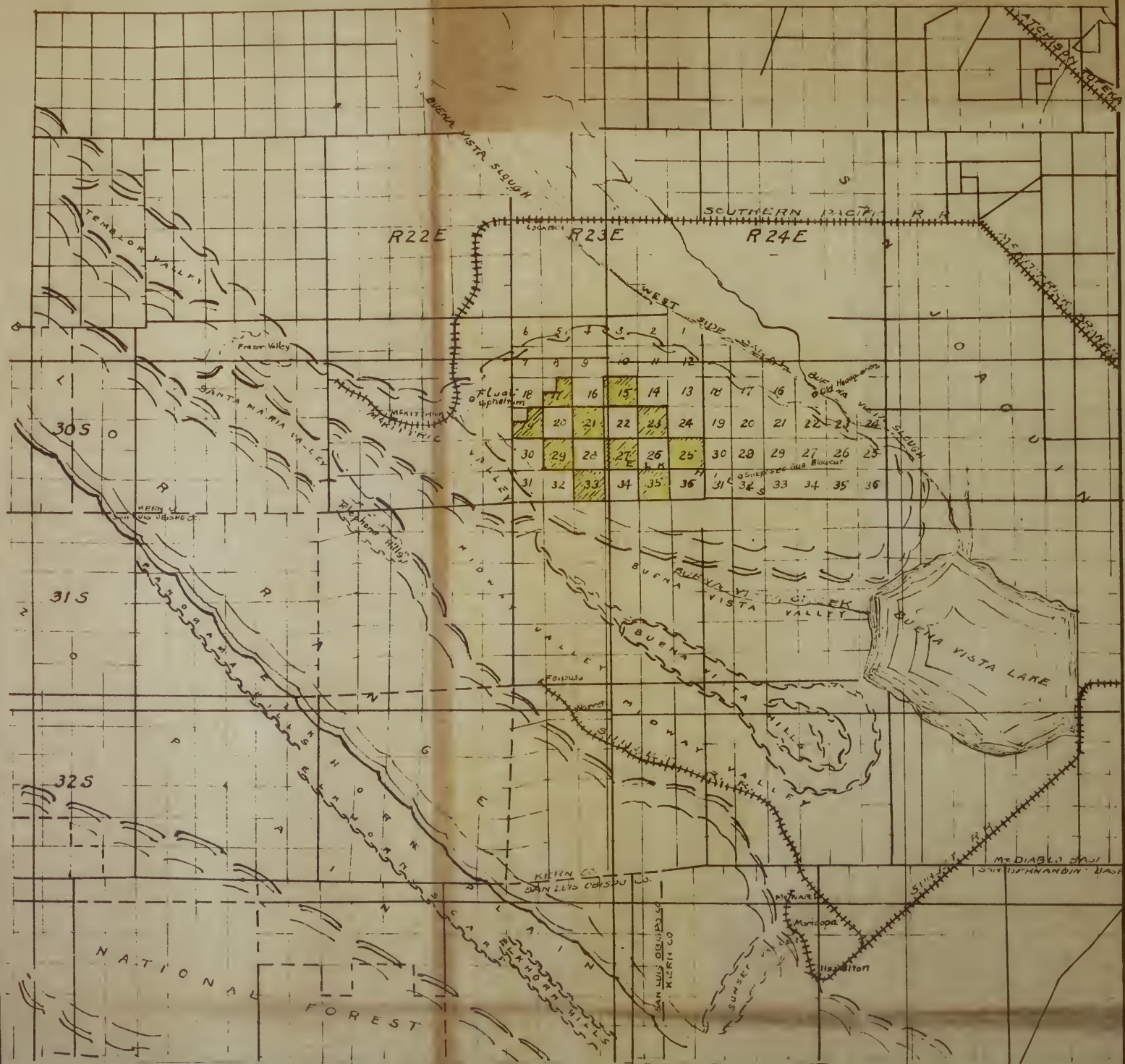
Total number of wells drilled - - - - -	773
Total number which have produced oil or gas - - -	405
Total number of dry holes - - - - -	371
Total supposed oil field in acres - - - - -	116,000
Actual area of oil land proven by drill	
at five acres per well, acres - - - - -	2,025

R. 22E



A hand-drawn geological map on a grid. The grid has horizontal numbers 1 through 11 and vertical numbers 1 through 36. The map shows a road labeled "SPRUITRICK ASPHALT" running from the bottom left towards the top right. A green shaded area is located in the upper left quadrant. A red line runs diagonally from the top left towards the bottom right. Various points are marked with numbers 1 through 36 and letters A, E, U, P. The map is labeled "T295" at the top right, "T305" on the right, and "T315" at the bottom right.

Map received by E.T. Dumble from J.B. Goodwell in 1902 Tr page 2903

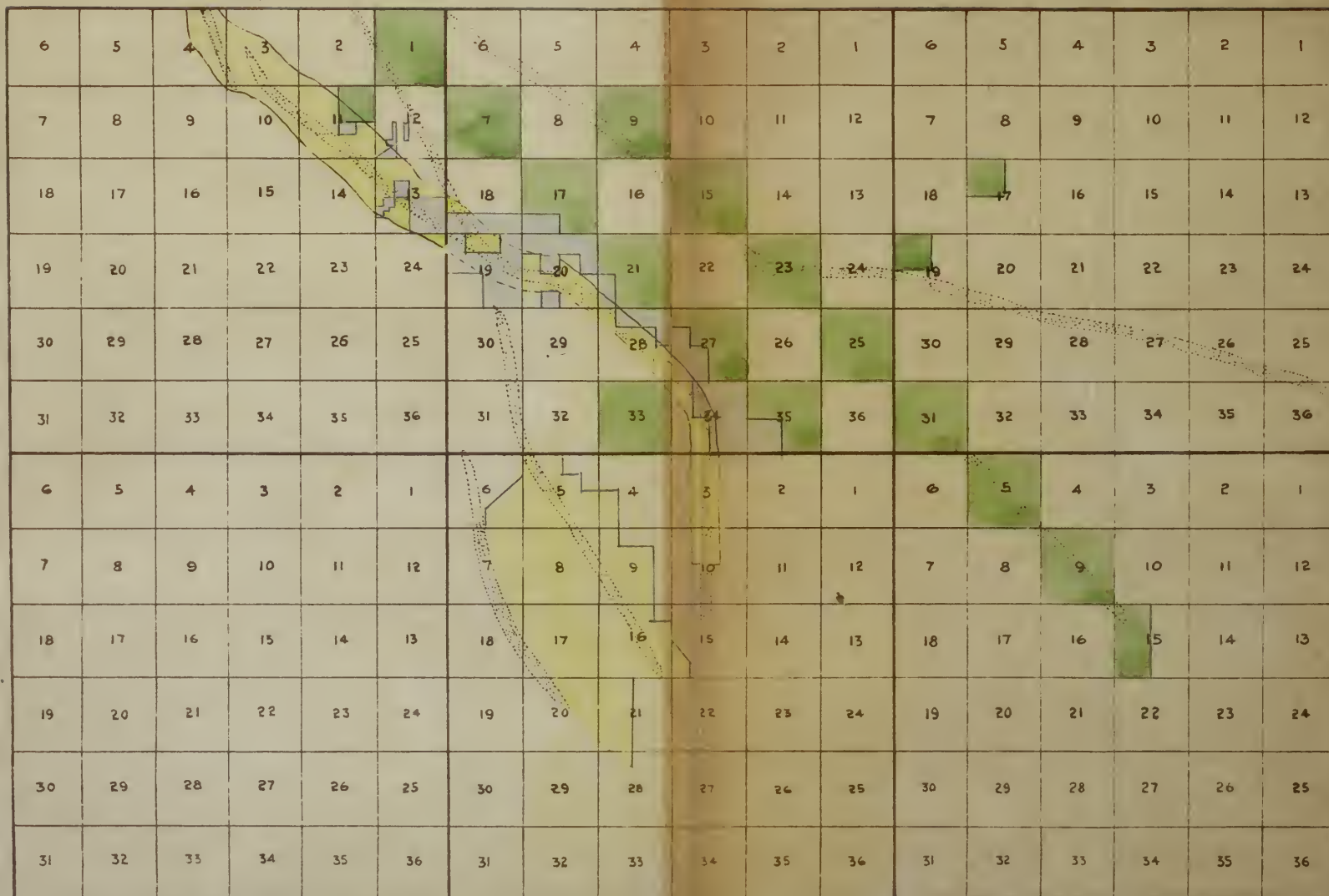








R.21E.

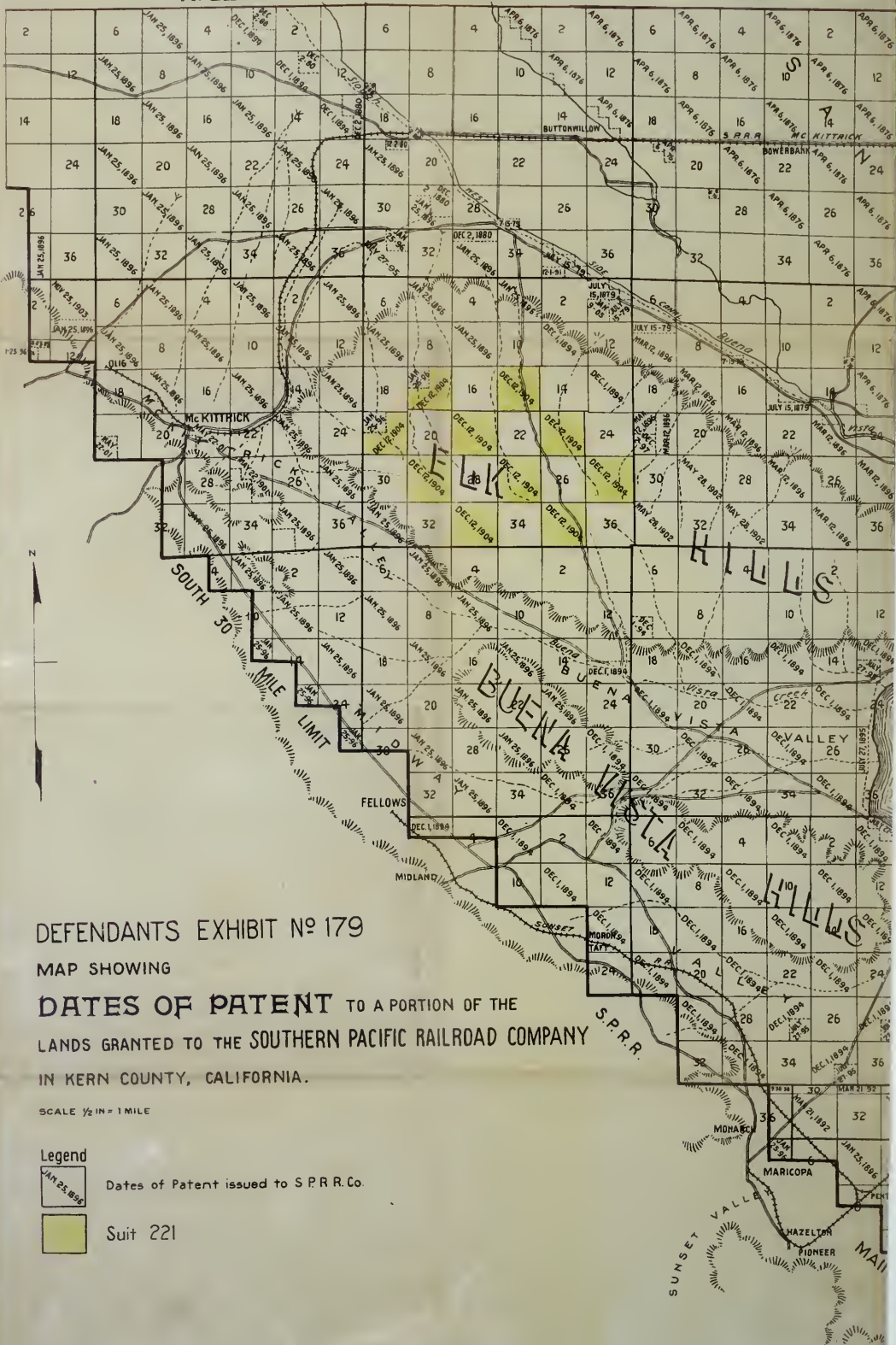
R.22E

R.23 E.



Map received with Owen letter of March 25, 1903
(Tr. page 2977)

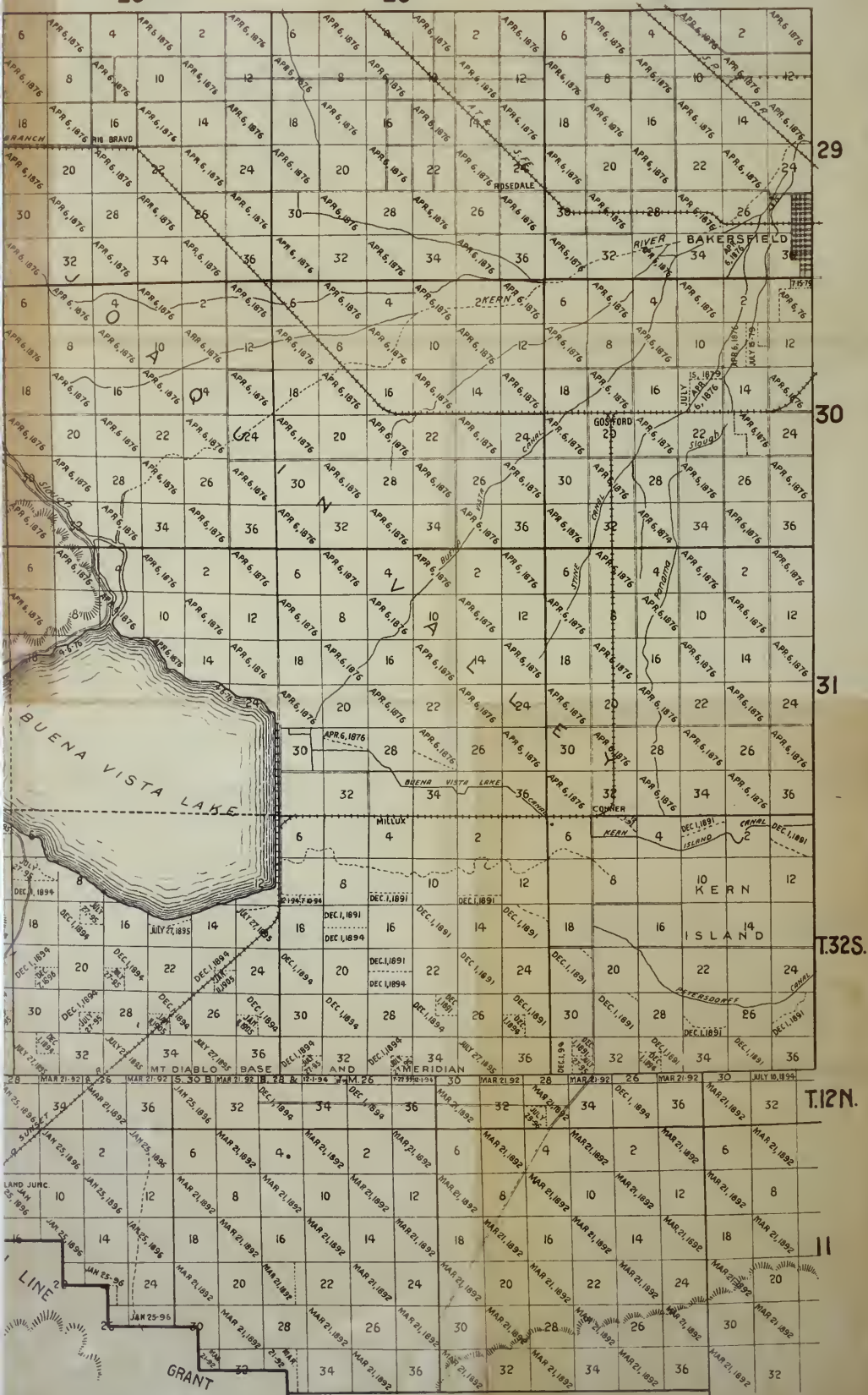
-  Apex of Anticline
-  S.P.R.R. Lands should be reserved
-  Lands supposed to contain oil
-  Consolidated Oil Co. in which S.P.R.R. owns 1/2 int.



25

26

R.27 E.



T 295

OIL SEEPAGES
GAS ..

- WELLS WHICH HAVE PRODUCED OR ARE PRODUCING OIL OR GAS INCOMPLETE (DRILLING OR IDLE)

— — — — — ANTICLINE DOUBTFUL

ORIGINAL GOVERNMENT CORNERS FOUND

DIPS AND AMOUNTS

LAND INVOLVED IN EQUITY SUIT 221

DEPTH OF WELLS AS SHOWN ON THIS PLAT NOT GIVEN BY WITNESS
MARTIN BUT TAKEN FROM DEFENDANTS EXHIBIT NO 16

DATA BROUGHT DOWN TO 1912

T.29 S.

T30S.

T30S.

T.31S.

T.32S

T32S

R.22E.

R 23E.

R 24 E.

1. Mr. Martin, Mr. King
6. Mr. King, Mr. King
" " " "

R.23E.

R.24E.

DEFENDANTS EXHIBIT No 16
 PLAT
 SHOWING DEVELOPMENT AND APPROXIMATE LOCATION OF SAME
 IN
 ELK HILLS AND CONTIGUOUS TERRITORY
 KERN COUNTY, CALIFORNIA

SCALE 40 CHS = 1 IN
 1913

See Tr Page 2257

LEGEND

- LOCATION FOR DERRICK
- ◇ DERRICK ONLY (NOT DRILLED)
- ◆ DRY HOLE (NOT WORKING OR ABANDONED)
- WELLS SHOWING OIL (NOT PRODUCING)
- PRODUCING WELLS
- DRILLING WELLS
- LANDS IN FEDERAL SUIT No 221

